

## Nguyen, Tung

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**From:** Nguyen, Tung  
**Sent:** Thursday, March 02, 2017 6:09 AM  
**To:** Gabaldon, Sandra, NMENV  
**Cc:** Foote, Jennifer, NMENV  
**Subject:** FW: NM0022250 Permit Renewal Application  
**Attachments:** 20170221 NPDES Permit NM0022250 Renewal Application.pdf

Hi Sandra,

Could you please provide the information below:

USGS Flow Station  
WQ Monitoring Station No.  
Receiving Stream TSS (mg/l)  
Receiving Stream Hardness (mg/l as CaCO<sub>3</sub>)  
Receiving Stream Critical Low Flow (4Q3) (cfs)  
Receiving Stream Harmonic Mean Flow (cfs)  
Avg. Receiving Water Temperature (C)  
pH (Avg), Receiving Stream  
Fraction of stream allowed for mixing (F)

Thank you,

Tung Nguyen  
Permitting Section (6WQ-PP), Water Division  
U.S. EPA, Region 6  
1445 Ross Ave.  
Dallas, TX 75202  
Ph: 214-665-7153  
Fax: 214-665-2191

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**From:** Kelly, Mark P. [mailto:mkelly@abcwua.org]  
**Sent:** Wednesday, February 22, 2017 5:30 PM  
**To:** Nguyen, Tung  
**Subject:** NM0022250 Permit Renewal Application

Mr. Nguyen,

We have sent the permit renewal application in. Attached is an electronic copy. I look forward to discussing our proposed changes on March 7<sup>th</sup>, which are found in Enclosure 2 of the application and I have reproduced below.

Please let me know if you have any questions or comments.

Regards,

Mark Kelly

## ENCLOSURE 2

### REQUESTED MODIFICATIONS TO PERMIT CONDITIONS FOR ALBUQUERQUE BERNALILLO COUNTY WATER UTILITY AUTHORITY SOUTHSIDE WATER RECLAMATION PLANT PERMIT NO. NM0022250

1. Decrease frequency of Mercury monitoring.

Section A.1 of Part I of the current permit requires monitoring the effluent weekly for mercury using EPA Method 1631E. This method measures mercury to 0.0002 micrograms per liter ( $\mu\text{g/L}$ ). The analytical costs for this monitoring is approximately \$720 per week including blanks and duplicates. Weekly monitoring results between October 2012 and December 2016 show only two (2) exceedances of the limit (2 out of 222 results). The Water Authority requests a reduced monitoring frequency.

2. Change of Mercury monitoring from composite to grab.

In addition, Section A.1 of Part I of the current permit requires a 24-hour flow-weighted composite sample for the mercury monitoring. Because of the nature of this monitoring, composite sampling is challenging due to a high potential for atmospheric contamination. EPA Method 1631E highlights grab sampling as an appropriate collection type. The Water Authority requests a change to grab sample for the sample type.

3. Removal of Total Residual Chlorine (TRC) monitoring.

Section A.1 of Part I of the current permit requires daily grab samples for TRC. Disinfection is performed by a state of the art ultraviolet disinfection system. No chlorine is used in the wastewater treatment process. Daily monitoring results between October 2012 and December 2016 show that TRC has not been detected in the effluent. The plant reuse water is chlorinated with sodium hypochlorite contained in a separate building. The Water Authority requests that TRC monitoring and the associated effluent limitation be removed from the permit.

4. Removal of Arsenic monitoring.

The current permit requires monthly monitoring for arsenic. Arsenic levels are very low. The Water Authority requests that the monitoring requirement be removed or the monitoring frequency be reduced.

5. Change in pH monitoring from grab to continuous.

Section A.1 of Part I of the current permit requires an instantaneous grab sample for pH. The Water Authority requests continuous pH monitoring instead of grab as allowed by 40 CFR 401.17.

6. Decrease frequency of Whole Effluent Toxicity testing.

Section A.1 of Part I of the current permit requires quarterly monitoring of the effluent for Whole Effluent Toxicity. No toxicity has been identified in 17 tests conducted between October 2012 and December 2016. As provided in Section 4 of Part II, Appendix B of the current permit, the Water Authority requests the monitoring frequency be reduced to annual for both species (*Pimephales promelas* and *Ceriodaphnia dubia*) as no toxicity has been identified for either species.

7. Notification of Sanitary Sewer Overflows.

Section C.6 of Part I of the current permit requires the Water Authority to notify by telephone the Pueblo of Isleta and New Mexico Environment Department (NMED) of “any noncompliance which may endanger health or the environment”. The Water Authority has been contacting those entities for each overflow event. In the majority of cases, a live person doesn’t answer the call and a message is left. Email addresses have been provided for both entities and an email notification is forwarded shortly after the phone calls are made along with the notification to EPA Region 6. The Water Authority requests that the notification requirement be changed to email only to all parties.

In addition, most overflows do not reach a storm drain or the receiving water (the Rio Grande). Therefore, the Water Authority requests that this provision be changed to require notification to all parties only for instances when the overflows reach the Rio Grande.

8. Removal of notification for overflows on the SWRP plant site.

In addition, Section C.6 of Part I of the current permit has been interpreted to mean that overflows that occur within the Southside Water Reclamation Plant site must also be reported. In 2015, the Water Authority plugged the storm drains on the plant site. Because there is no potential discharge of overflows from the SWRP to a Waters of the United States, the Water Authority requests that the requirement for notification of overflows apply only to overflows from the sanitary sewer.

Requested Modifications for Permit No. NM0022250 Page 2

***Mark Kelly, PE***

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